

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

SUPPRESSED

**FILED**

**MAY 23 2019**

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

CLYDE JEFFERSON and  
EBONY CANNAMORE,

Defendants.

**4:19CR398 ERW/PLC**

**INDICTMENT**

The Grand Jury charges that

**INTRODUCTION**

That at all times material to this Indictment,

1. Facebook is a social networking company headquartered in Menlo Park, California and is a business operating in and affecting interstate commerce.
2. Facebook Marketplace is a Facebook service which allows anyone with a Facebook profile to buy and sell items directly through Facebook.
3. OfferUp is a company headquartered in Bellevue, Washington and is a business operating in and affecting interstate commerce.
4. The OfferUp platform is a mobile-only marketplace that facilitates the buying and selling of goods via the OfferUp application ("app"). Buyers and sellers communicate directly through the app.
5. Letgo is a company headquartered in New York City and Barcelona and is a business operating in and affecting interstate commerce.
6. Letgo provides users with a website and an app that allows users to buy, sell and chat with other users.

7. Craigslist is a company headquartered in San Francisco, California and is a business operating in and affecting interstate commerce.
8. Craigslist is a web-based classified ads service that allows users to buy and sell items with other users.

**COUNT ONE**

On or about August 3, 2018, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that after J.A. used Facebook Marketplace to arrange for the sale of J.A.'s iPhone, J.A. met with the defendant to complete the transaction and the defendant did unlawfully take and obtain J.A.'s property that is, an Apple iPhone, from J.A. and against the will of J.A. by means of actual and threatened force, violence, and fear of injury, immediate and future, to J.A.

In violation of Title 18, United States Code, Sections 1951 and 2.

**COUNT TWO**

On or about August 3, 2018, in St. Louis City, in the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

did knowingly brandish a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is interfering with commerce by robbery, in violation of Title 18, United States Code, Section 1951, as alleged in Count One of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT THREE**

On or about August 3, 2018, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, with intent to defraud, did pass and utter to J.A., a falsely made, forged and counterfeited obligation of the United States, that is, a Federal Reserve Note in the denomination of twenty dollars, Serial No. ML0423350N, which he then knew to be falsely made, forged and counterfeited.

In violation of Title 18, United States Code, Sections 472 and 2.

**COUNT FOUR**

On or about September 21, 2018, in the City of St. Louis, within the Eastern District of Missouri, the defendant

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that after S.H. used OfferUp to arrange for the sale of S.H.'s iPhone, S.H. met with the defendant to complete the transaction and the defendant did unlawfully take and obtain S.H.'s property that is, an Apple iPhone, from S.H. and against the will of S.H. by means of actual and threatened force, violence, and fear of injury, immediate and future, to S.H.

In violation of Title 18, United States Code, Sections 1951 and 2.

**COUNT FIVE**

On or about September 21, 2018, in St. Louis City, in the Eastern District of Missouri,

the defendant,

**CLYDE JEFFERSON,**

did knowingly brandish a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is interfering with commerce by robbery, in violation of Title 18, United States Code, Section 1951, as alleged in Count Four of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT SIX**

On or about September 21, 2018, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, with intent to defraud, did pass and utter to S.H., a falsely made, forged and counterfeited obligation of the United States, that is, a Federal Reserve Note in the denomination of twenty dollars, Serial No. MA20841243C, which he then knew to be falsely made, forged and counterfeited.

In violation of Title 18, United States Code, Sections 472 and 2.

**COUNT SEVEN**

On or about October 8, 2018, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that after L.R. used Facebook Marketplace to arrange for the sale of L.R.'s iPhone, L.R. met with the defendant to complete the transaction and the defendant did

unlawfully take and obtain L.R.'s property that is, an Apple iPhone, from L.R. and against the will of L.R. by means of actual and threatened force, violence, and fear of injury, immediate and future, to L.R.

In violation of Title 18, United States Code, Sections 1951 and 2.

**COUNT EIGHT**

On or about October 8, 2018, in St. Louis City, in the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

did knowingly brandish and discharge a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is interfering with commerce by robbery, in violation of Title 18, United States Code, Section 1951, as alleged in Count Four of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT NINE**

On or about October 8, 2018, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, with intent to defraud, did pass and utter to S.H., a falsely made, forged and counterfeited obligation of the United States, that is, a Federal Reserve Note in the denomination of twenty dollars, Serial No. MH61110029B, which he then knew to be falsely made, forged and counterfeited.

In violation of Title 18, United States Code, Sections 472 and 2.

**COUNT TEN**

On or about January 8, 2019, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that after a juvenile victim known to the Grand Jury used LetGo to arrange for the sale of the victim's iPhone, the victim met with the defendant to complete the transaction and the defendant did unlawfully take and obtain the victim's property that is, an Apple iPhone, from the victim and against the will of the victim by means of actual and threatened force, violence, and fear of injury, immediate and future, to the victim

In violation of Title 18, United States Code, Sections 1951 and 2.

**COUNT ELEVEN**

On or about January 8, 2019, in St. Louis City, in the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

did knowingly brandish a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is interfering with commerce by robbery, in violation of Title 18, United States Code, Section 1951, as alleged in Count Ten of this indictment.

In violation of Title 18, United States Code, Sections 924(c)(1).

**COUNT TWELVE**

On or about January 8, 2019, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, with intent to defraud, did pass and utter to a juvenile victim known to the Grand Jury a falsely made, forged and counterfeited obligation of the United States, that is, a Federal Reserve Note in the denomination of one



hundred dollars, Serial No. JH41252209A, which he then knew to be falsely made, forged and counterfeited.

In violation of Title 18, United States Code, Sections 472 and 2.

**COUNT THIRTEEN**

On or about January 29, 2019, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, did intentionally and unlawfully obstruct, delay and affect, and attempt to obstruct delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that after E.A. used Facebook Messenger to arrange for the sale of E.A.'s iPhone, E.A. met with the defendant to complete the transaction and the defendant did unlawfully take and obtain E.A.'s property that is, an Apple iPhone, from E.A. and against the will of E.A. by means of actual and threatened force, violence, and fear of injury, immediate and future, to E.A.

In violation of Title 18, United States Code, Sections 1951 and 2.

**COUNT FOURTEEN**

On or about January 29, 2019, in St. Louis City, in the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

did knowingly brandish a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is interfering with commerce by robbery, in violation of Title 18, United States Code, Section 1951, as alleged in Count Thirteen of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT FIFTEEN**

On or about February 7, 2019, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

after having previously been convicted of a crime punishable by a term of imprisonment exceeding one year under the laws of the State of Missouri, did knowingly possess a firearm to wit: one Springfield Armory, .40 caliber semi-automatic pistol which had been manufactured outside the State of Missouri and had been transported in interstate or foreign commerce prior to the defendant's possession of it on February 7, 2019.

In violation of Title 18, United States Code, Sections 922(g) and 2.

**COUNT SIXTEEN**

On or about February 7, 2019, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, with intent to defraud, did possess a falsely made, forged and counterfeited obligation of the United States, that is, a Federal Reserve Note in the denomination of twenty dollars, Serial No. MK10464892F, which he then knew to be falsely made, forged and counterfeited.

In violation of Title 18, United States Code, Sections 472 and 2.

**COUNT SEVENTEEN**

On or about February 27, 2018, in St. Louis County, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, with intent to defraud, did pass and utter to J.K., a falsely made, forged and counterfeited obligation of the United States, that is, a Federal Reserve Note in the denomination of one hundred dollars, Serial No. LB55122254E,



which he then knew to be falsely made, forged and counterfeited.

In violation of Title 18, United States Code, Sections 472 and 2.

**COUNT EIGHTEEN**

On or about September 24, 2018, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, with intent to defraud, did pass and utter to J.L., a falsely made, forged and counterfeited obligation of the United States, that is, a Federal Reserve Note in the denomination of twenty dollars, Serial No. MA20841243C, which he then knew to be falsely made, forged and counterfeited.

In violation of Title 18, United States Code, Sections 472 and 2.

**COUNT NINETEEN**

On or about January 15, 2019, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, with intent to defraud, did pass and utter to A.N. and C.B., a falsely made, forged and counterfeited obligation of the United States, that is, a Federal Reserve Note in the denomination of twenty dollars, Serial No. MF1703166D, which he then knew to be falsely made, forged and counterfeited.

In violation of Title 18, United States Code, Sections 472 and 2.

**COUNT TWENTY**

On or about February 5, 2019, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**CLYDE JEFFERSON,**

together with others known and unknown to the Grand Jury, with intent to defraud, did pass and utter to B.F., a falsely made, forged and counterfeited obligation of the United States, that is, a

Federal Reserve Note in the denomination of twenty dollars, Serial No. MK77215329D which he then knew to be falsely made, forged and counterfeited.

In violation of Title 18, United States Code, Sections 472 and 2.

**COUNT TWENTY-ONE**

On or about November 6, 2018, in the City of St. Louis, within the Eastern District of Missouri, the defendant,

**EBONY CANNAMORE,**

together with others known and unknown to the Grand Jury, with intent to defraud, did possess a falsely made, forged and counterfeited obligation of the United States, that is, Federal Reserve Notes in the denomination of twenty dollars, bearing Serial Nos. MH61110029B and MG73971098E, and a Federal Reserve Note in the denomination of one hundred dollars, bearing Serial No. LG54551463D, which she then knew to be falsely made, forged and counterfeited.

In violation of Title 18, United States Code, Sections 480 and 2.

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

\_\_\_\_\_  
JENNIFER J. ROY, #47203MO  
Assistant United States Attorney